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*Attorneys for Defendants  
Songs of Universal, Inc.,  
Sony Music Publishing (US) LLC,  
Sony Music Entertainment, and  
Chris Brown Entertainment, LLC*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

TYKEIYA DORE and MARC A.  
STEPHENS,

Plaintiffs,

v.

CHRIS BROWN ENTERTAINMENT,  
LLC d/b/a CHRISTOPHER BROWN  
ENTERTAINMENT, LLC, et al.,

Defendants.

Civil Action No. 24-10103 (MCA) (MAH)

*Document Electronically Filed*

**NOTICE OF MOTION TO DISMISS  
OR TRANSFER VENUE**

**ORAL ARGUMENT REQUESTED**

**PLEASE TAKE NOTICE** that on April 21, 2025, or as soon thereafter as counsel may be heard, Defendants Songs of Universal, Inc., Sony Music Publishing (US) LLC, Sony Music Entertainment, and Chris Brown Entertainment, LLC (collectively, the “Moving Defendants”), by and through their undersigned counsel, shall move before the Honorable Madeline Cox Arleo, U.S.D.J. at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S.

Courthouse, Newark, New Jersey 07102, for an Order dismissing Plaintiffs' Complaint against the Moving Defendants pursuant to Federal Rule of Civil Procedure 12(b)(2), (3), and (6) or, alternatively, transferring the action pursuant to 28 U.S.C. §§ 1404 and 1406.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, the Moving Defendants shall rely upon the accompanying Memorandum of Law, Declarations and exhibits attached thereto, Request for Judicial Notice, and all prior pleadings and papers on file in this action.

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of order is submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that a certification attesting to the date and manner of service is also submitted herewith.

Dated: March 28, 2025  
Newark, New Jersey

Respectfully submitted,  
s/ Samuel I. Portnoy  
Samuel I. Portnoy  
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